

FILED

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

2002 APR 16 PM 4:18

IN RE:

SHOOK & FLETCHER
INSULATION CO.,

Debtor.

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Case No. 02-02771
Chapter 11

BANKRUPTCY COURT
N.D. OF ALABAMA

**SUPPLEMENTAL DECLARATION
OF RICHARD P. CARMODY**

1. On April 8, 2002, I filed a Declaration in Support of Application for Authority to Employ Lange, Simpson, Robinson & Somerville LLP as Local Bankruptcy Counsel for the Debtor and Debtor-in-Possession (the "**Declaration**").

2. Since that date, under my direction, the staff and attorneys of Lange, Simpson, Robinson & Somerville LLP have conducted additional analysis of the list of entities attached as Exhibit "A" to the Declaration.

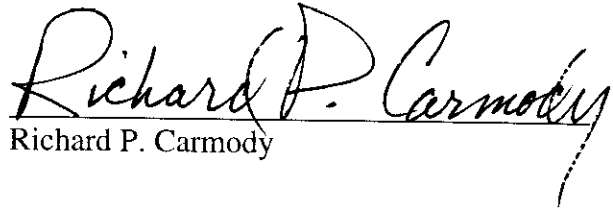
3. To supplement the Declaration, I would add the following information:

a. G. Auston Young is a former client of the Firm.

b. The Firm represents Zurn Industries, Inc. in a case styled *Danny E. Lawson, Executor of the Estate of Olene S. Dowdy, Deceased v. Metropolitan Life Insurance Co., et al.*, Case No. CV-2000-367, in the Circuit Court of Talladega County, Alabama. The Debtor is a codefendant in this case, but Zurn Industries has not asserted a cross claim against the Debtor.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Richard P. Carmody

Executed on April 16, 2002.

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